

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America)

v.)

Drummond, Richard)

Case No.)

B-16-397-MJ

United States District Court
Southern District of Texas
FILED

APR 18 2016

Defendant(s)

CRIMINAL COMPLAINT

David J. Bradley, Clerk of Court

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 14, 2016 in the county of Cameron in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

In violation of Title 18 United States
 Code, Section(s) 2252A.

Title 18 United States Code, Sections(s) 2252 A makes it a federal offense for any person to knowingly receive or distribute child pornography that has been mailed, or has been shipped or transported in interstate or foreign commerce, or which contains materials which have been mailed or so shipped or transported, by any means, including computer, or knowingly reproduce child pornography for distribution in interstate or foreign commerce by any means, including by computer, or through the mail.

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

✓ Continued on the attached sheet.

Complainant's signature

Kristopher Vega Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

April 18, 2016

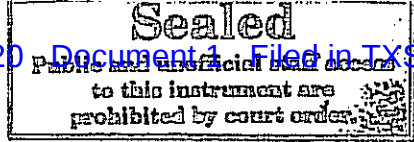
Judge's signature

City and state:

Brownsville, Texas

Ignacio Torteya, III, U.S. Magistrate

Printed name and title



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v.

Richard Drummond

Case No. B-16-397-mj

Defendant

AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT

ATTACHMENT "A"

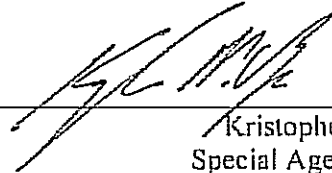
I, Kristopher M. Vega, your affiant, being sworn and deposed, state the following:

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (HSI). I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations and to make arrest for federal felonies.
2. I have been employed by HSI since 2010. During my tenure as an HSI Special Agent, I have participated in numerous criminal investigations involving white collar crime, fugitive apprehensions, narcotics trafficking, child exploitation, as well as other unlawful activities. I have participated in numerous searches, arrests, and seizure warrants involving a variety of offenses. I am currently assigned to the Brownsville, Texas division of HSI.
3. I make this affidavit in support of a criminal complaint and arrest warrant related to the possession of child pornography committed by the defendant, Richard DRUMMOND. The information contained in this affidavit is based upon my personal knowledge, as well as information obtained from other sources, including federal agents and local police officers. I have limited this affidavit to those facts necessary to support a finding of probable cause that DRUMMOND violated Title 18, United States Code, Section 2252 (possession of child pornography). Accordingly, this affidavit does not include a complete recitation of the entire investigation or of each and every fact and matter observed by or known to law enforcement relating to the subject and in part, and is not intended to be a verbatim recitation of the entire statement made by the individual.

PROBABLE CAUSE

4. During the course of this investigation, I have learned the following regarding the possession of child pornography:

- A. On March 11, 2016, Homeland Security Investigations received information from the Port Isabel Police Department regarding electronic storage devices seized during the execution of a state search warrant for child pornography and continuing sexual assault of a child at the residence of Richard Drummond located at [REDACTED] in Los Fresnos, Texas.
- B. State Officers had seized items that contained images of child pornography. The victim had stated during an interview that she had been shown child pornography on the defendant's tablet in conjunction with her sexual assault by the defendant. In my training and experience working with child pornography investigations, child pornographers can easily transfer images from computers, tablets, disks, or thumb drives in order to view the child pornography on various electronic devices.
- C. The electronic devices found during the state search warrant consisted of two desktop computers, two laptop computers, three tablet computers, and seven USB thumb drives. HSI Computer Forensics Agents were given the electronic devices for forensic analysis. During the forensic analysis, agents identified 1,715 images of minors engaged in sexually explicit conduct meeting the definition of "child pornography" as defined by Title 18, United States Code, Section 2256.
5. Richard DRUMMOND violated Title 18, United States Code, Section 2252, on April 14, 2016, by having in his possession 1,715 pictures files of child pornography on his electronic devices. Based on the above information, your affiant believes on the date listed above, Richard DRUMMOND violated Title 18, United States Code, Section 2252. These violations occurred within the Southern Judicial District of Texas.



Kristopher Vega
Special Agent, HSI

Sworn and subscribed before me

this 18th day of April 2016.



Ignacio Torleya, III
United States Magistrate Judge